

### **REMARKS/ARGUMENTS**

These remarks are made in response to the Office Action of January 7, 2009 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due. However, the Examiner is expressly authorized to charge any deficiencies and credit any overpayments to Deposit Account No. 14-1437.

### **Claim Rejections - 35 U.S.C. § 103**

Claims 1-3 and 8-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,219,653 to O'Neill, *et al.* (hereinafter O'Neill), U.S. Patent 6,642,946 to Janes, *et al.* (hereinafter Janes), U.S. Patent 6,182,052 to Fulton, *et al.* (hereinafter Fulton), and in further view of U.S. Patent 5,491,795 to Beaudet, *et al.* (hereinafter Beaudet) and U.S. Patent 7,184,973 to Monteleone, *et al.* (hereinafter Monteleone). Claims 9-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over O'Neill, Janes, Fulton, and Beaudet in further view of Monteleone and U.S. Patent 7,051,072 to Stewart, *et al.* (hereinafter Stewart).

Applicants respectfully disagree with the rejections and thus have not amended the claims to overcome the art rejections. Claims 29-36 have been added. The added claims are fully supported by the original disclosure and no new matter has been introduced.

### **Certain Aspects Of The Invention**

It may be useful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One embodiment of the invention, as typified by Claim 1, is a computer-implemented method for conducting business-to-business (B2) transactions.

The method can include determining one or more e-commerce partners. After determining one or more e-commerce partners, a further step can be performed with respect to each e-commerce partner so as to determine whether one or more of the e-commerce partners is an active partner based on at least one predetermined criteria. (See, e.g., Specification, paragraph [0023], lines 4-7; see also paragraph [0039], lines 2-4.)

More particularly, the determination of whether the e-commerce partner is an active partner can be made on the basis of one or more of the following steps, each based on a corresponding criterion: detecting whether a transaction has occurred with the e-commerce partner within a designated time period; determining whether transactions involving the e-commerce partner exceed a designated valuation threshold; determining whether a transaction involving the e-commerce partner exceeds a designated data size; and determining whether the e-commerce partner has a preference level above a designated preference level. (See, e.g., Specification, paragraph [0024], lines 1-13.) Moreover, the criteria for determining whether an e-commerce partner is an active partner can be adjustable. (See, e.g., Specification, paragraph [0010], lines 12-14.)

The method also can include presenting a partner identifier as an expandable partner node within a commerce graphical user interface for the e-commerce partner if it is determined that the e-commerce partner is an active partner; and when the partner node is expanded, presenting at least one transaction identifier and any transmission error as a child node of the expanded partner node, wherein each transaction identifier represents an electronic commerce transaction between a user of the commerce graphical user interface and the e-commerce partner. (See, e.g., Specification, paragraph [0041], lines 1-7.)

The method further can include categorizing a node associated with at least one of a transmission and an e-commerce partner; visually differentiating the node from other nodes at the same node level and at a different node level based upon a category of the node; and assigning responsible personnel to transactions based on predetermined rules.

The predetermined rules are adjustable. (See, e.g., Specification, paragraphs [0020] and [0025]; see also original Claim 12).

**The Claims Define Over The Cited References**

In general, in O'Neill the burden is always on the user to input information whereas in the present invention business rules are applied to provide relevant functions.

It was asserted in the Office Action that col. 5, lines 57-65 of O'Neill discloses determining at least one e-commerce partner. However, O'Neill merely refers to the existence of buyers and sellers using the system. O'Neill does not disclose any determination step by the computer system as in the present invention.

It was asserted in the Office Action that O'Neill discloses in col. 16, lines 35-45 determining whether each partner is an active partner. However, it is noted that O'Neill burdens the user to make a mental determination about active/inactive status, whereas the present invention applies rules to automatically determine active/inactive status.

It was asserted in the Office Action that O'Neill discloses in col. 8, lines 37-38 and col. 11, lines 45-53 determining whether the e-commerce partner has a preference level above a designated preference level. However, O'Neill does not specify the preferences and therefore the user must determine using criteria of his/her choosing. In contrast, in the present invention the preference level is pre-established using rules at configuration time, long before the user even attempts to use the system of the present invention.

It was asserted in the Office Action that O'Neill discloses in col. 16, lines 35-45 that the corresponding criteria for determining whether an e-commerce partner is an active partner are adjustable. However, it is noted that in O'Neill the user sets trading status manually. In contrast, in the present invention, the trading status is determined by execution of rules and criteria wherein the criteria are adjustable.

It was asserted in the Office Action that O'Neill discloses in col. 15, lines 42-64 presenting a partner identifier within a commerce graphical user interface for the e-commerce partner if it is determined that the e-commerce partner is an active partner. However, it is noted that O'Neill refers to GUIs that support trading partners and networks. O'Neill does not disclose presenting a partner identifier for an active partner within a GUI.

It was asserted in the Office Action that Janes teaches a method of displaying business transactions wherein partner identifiers are presented as expandable nodes presenting at least one transaction identifier as a child node, wherein each identifier represents an e-commerce transaction between a user and an e-commerce partner; categorizing a node and visually differentiating the node from other nodes (Janes: Fig. 2G, *Vendor 2 expanded presents transaction 901; Vendor 2 icon different from 901 icon*; col. 9, lines 43-45). However, it is noted that Janes does not even refer to a B2B gateway. Rather, Janes concerns an application to track livestock orders, which does not possess any of the characteristics of a B2B gateway (which encompass inbound and outbound transactions in conformance with a standard like EDI, AS2, etc.).

It was asserted in the Office Action that Fulton teaches a communications network for conducting transactions wherein transaction errors are displayed to the user (Fulton, col. 5, lines 63-67). However, it is noted that the present invention does not refer to failed transactions as in Fulton, but rather refers to transmission errors such as EDI content errors (e.g., poorly-formed EDI messages).

The other cited references do not make up for the deficiencies of O'Neill as well as of a combination of O'Neill, Janes and Fulton.

Accordingly, the cited references, alone or in combination, fail to disclose or suggest each and every element of Claims 1, 29, and 36. Applicants therefore respectfully submit that Claims 1, 29, and 36 define over the prior art. Furthermore, as

each of the remaining claims depends from Claims 1 or 29 while reciting additional features, Applicants further respectfully submit that the remaining claims likewise define over the prior art.

Applicants thus respectfully request that the claim rejections under 35 U.S.C. § 103 be withdrawn.

### **CONCLUSION**

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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